

Message

From: Dykes, Teresa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C904D32B6A845D09D8F814C2F6509A0-TDYKES]
Sent: 9/25/2018 4:11:44 PM
To: Lancey, Susan [lancey.susan@epa.gov]
Subject: RE: Fairhaven Shipyards request for permit revision/voidance

Susan- Thank you. I am hoping to find on the record the analysis that the state hopefully did to estimate the VOC using the weighted amounts and the support they used for VOC being a surrogate for HAPs even though some of the HAPs may be exempted as VOC. I appreciate your help here. Again- just to be clear- I am looking at this as a training example- and not any enforcement issues.

Terri Dykes
Senior Attorney
Office of Enforcement and Compliance Assurance
1200 Pennsylvania Ave. NW
Washington, DC 20460
202.564.9883

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From: Lancey, Susan
Sent: Tuesday, September 25, 2018 9:15 AM
To: Dykes, Teresa <Dykes.Teresa@epa.gov>
Subject: RE: Fairhaven Shipyards request for permit revision/voidance

Hi Terri,

I left a message for the permit contact at the state. I will get back to you.

Susan Lancey
U.S. EPA New England
5 Post Office Square
Suite 100 (OEP05-2)
Boston, MA 02109
Phone: (617) 918-1656

From: Dykes, Teresa
Sent: Monday, September 24, 2018 6:24 PM
To: Lancey, Susan <lancey.susan@epa.gov>
Cc: Dahl, Donald <dahl.donald@epa.gov>
Subject: RE: Fairhaven Shipyards request for permit revision/voidance

Susan or Donald- Apparently the limits were issued prior to this recent permit revision and Title V revocation in a Limited Plan Approval (LPA) Transaction X231364. The limits and the corresponding Title V permitting was the result of R1 enf. action and consent decree. Any chance that either of you have the initial application that imposed the synthetic minor limits, which resulted in Transaction X231364? I have searched MA's website, and it doesn't appear to have this type of historical data or archives. If you guys don't have it, do you know someone I can contact to get it? Thanks for your help in this.

Terri Dykes

Senior Attorney
Office of Enforcement and Compliance Assurance
1200 Pennsylvania Ave. NW
Washington, DC 20460
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From: Lancey, Susan
Sent: Monday, September 24, 2018 9:31 AM
To: Dykes, Teresa <Dykes.Teresa@epa.gov>
Cc: Dahl, Donald <dahl.donald@epa.gov>
Subject: FW: Fairhaven Shipyards request for permit revision/voidance

Hi Terri,

Here is the permit application for the Fairhaven Shipyard in MA. Let us know if you have any questions. Thank you,

Susan Lancey
U.S. EPA New England
5 Post Office Square
Suite 100 (OEP05-2)
Boston, MA 02109
Phone: (617) 918-1656

From: Cushing, Thomas (EQE) [<mailto:thomas.cushing@state.ma.us>]
Sent: Friday, June 29, 2018 3:17 PM
To: Sansevero, Christine <Sansevero.Christine@epa.gov>
Cc: Lancey, Susan <lancey.susan@epa.gov>; Marc Wolman <marc.wolman@state.ma.us>
Subject: FW: Fairhaven Shipyards request for permit revision/voidance

Christine, I received this request from Fairhaven Shipyard to rescind the Operating Permit for each of their two facilities. Each facility currently has a permit issued in accordance with 310 CMR 7.00, which restricts emissions to less than OP thresholds.

If you recall, these Facilities are in the OP program as a result of a Consent Agreement with the EPA relative to the Once In - Always In Policy. Therefore, before I rescind the OPs I would like to know if there is anything in your enforcement action that would prevent me from doing so.

Thomas Cushing
Permit Section Chief
MassDEP, Southeast Region
(508) 946-2824

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From: Kelly Cowan [<mailto:kcowan@woodardcurran.com>]
Sent: Wednesday, June 27, 2018 11:25 PM
To: Cushing, Thomas (DEP)

Cc: Kamieniecki, Daniel (DEP); Gary S. Golas - Fairhaven Shipyard Companies, Inc. (garyg@fairhavenshipyard.com); Kevin McLaughlin - Fairhaven Shipyard Company, Inc. (Kevin@Fairhavenshipyard.com); Tomas Ennis
Subject: Fairhaven Shipyards request for permit revision/voidance

Please see attached letter regarding Fairhaven Shipyards' air permits. Considering that the Shipbuilding MACT is no longer applicable, we would like to get the permits updated/voided as soon as feasible. Please let me know if there is anything I can do to move this along. Thank you.

Kelly A. Cowan, P.E.

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